



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES  
Attorney General

DIVISION OF SOCIAL JUSTICE  
Environmental Protection Bureau

December 18, 2024

BY CM/ECF

The Honorable Lewis J. Liman  
United States District Judge  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Chan v. U.S. Department of Transportation*  
No. 1:23-cv-10365-LJL  
*Mulgrew v. U.S. Department of Transportation*  
No. 1:24-cv-01644-LJL

Dear Judge Liman:

We write on behalf of Stephanie Winkelhake, defendant in the two above-referenced cases. Earlier today, defendants Metropolitan Transportation Authority and Triborough Bridge and Tunnel Authority (collectively, “MTA/Triborough”) filed reply briefs in further support of their summary judgment cross-motions [*Chan* ECF No. 161; *Mulgrew* ECF No. 147]. Ms. Winkelhake had previously joined those cross-motions and now joins the MTA/Triborough reply briefs.

Respectfully submitted,

/s/ *Andrew G. Frank*

Andrew G. Frank  
Assistant Attorney General

c: All counsel of record (by CM/ECF):